

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

In re:)	Chapter 11
)	
MERCY HOSPITAL, IOWA CITY,)	Case No. 23-00623 (TJC)
IOWA, <i>et al.</i>)	
)	(Jointly Administered)
Debtors.)	

**[PROPOSED] ORDER AUTHORIZING MERCY ACO LLC
AND MERCY HEALTH NETWORK, INC.
TO SEAL EXHIBITS TO RESPONSES**

Mercy Health Network, Inc. (“Mercy Health Network”) and Mercy ACO LLC (“Mercy ACO”) are parties to certain contracts which contain confidential and proprietary commercial information. Mercy Health Network and Mercy ACO intend to rely on and cite to these confidential contracts as exhibits in their respective responses to the Trustee of the Mercy Hospital Liquidation Trust’s (“Trustee”) Objections to General Unsecured Nonpriority Claim #10272 (“Response #1”) (objections filed at Dkt. Nos. 1777 and 1778) and Objections to Claim #10277 (“Response #2”). “On request of a party in interest, the bankruptcy court shall ... protect an entity with respect to a trade secret or confidential research, development, or commercial information.” 11 U.S.C. § 107(b)(1) (West); Fed. Bank. R. 9018(a)(1) (providing the Court may “protect ... any entity regarding a trade secret or other confidential research, development, or commercial information”). Having reviewed the motion, the Court determines it shall be GRANTED. Mercy Health Network and Mercy ACO shall file a redacted version of Response #1 and Response #2 and file unredacted versions of those pleadings and Exhibits B and C to those pleadings under seal.

Dated and entered this _____ day of _____, 2025.

Honorable Thad J. Collins, Chief Judge

Prepared and Submitted By:

BELIN McCORMICK, P.C.
Michael R. Reck
Christopher J. Jessen
666 Walnut Street, Suite 2000
Des Moines, Iowa 50309
Tel: (515) 243-7100
Fax: (515) 558-0645
mrreck@belinmccormick.com
cjessen@belinmccormick.com

*Attorneys for Mercy Health Network, Inc.
d/b/a MercyOne, Catholic Health Initiatives-Iowa Corp.,
Mercy ACO, LLC, Mercy Clinics, Inc.,
Mercy College of Health Sciences, and MH NACO, LLC*

M1617\0068\4608549)